

**In the Environment Court
at Christchurch**

**I Mua I Te Kōti Taiao o Aotearoa
Ōtautahi Rohe**

**In the Matter
And**

of the Resource Management Act 1991 **(Act)**

**In the Matter
And**

of the Queenstown Lakes Proposed District Plan –
Stage 3

In the Matter

of an appeal under Clause 14(1), Schedule 1 of
the Act

Between

Michael Thomas
(submissions 3003 and 3355)
Appellant

And

Queenstown Lakes District Council
Respondent

To: The Registrar
Environment Court
Christchurch

1. I, Michael Thomas (**Appellant**) appeal against part of a decision of the Queenstown Lakes District Council (**Council**) on the Queenstown Lakes Proposed District Plan – Stage 3 (**Proposed Plan**).
2. The Appellant made two submissions on the Proposed Plan (submissions 3003 and 3355).
3. The Appellant is not a trade competitor for the purposes of section 308D of the Act.
4. The Appellant received notice of the Council’s decision on 1 April 2021.
5. The decision was made by the Council through adopting the recommendations of the Independent Hearings Panel (**Panel**) on 18 March 2021.
6. The Appellant is appealing the part of the Council’s decision that:
 - a. Retains a Rural zoning over part of the land at 14 Bush Creek Road (Lot 1 DP20056 and Lot 1 DP24863).
 - b. Zones the Bush Creek Road area at Arrowtown as General Industrial Zone (**GIZ**) and any associated text contained in the PDP. This part of the decision is contained in Stream 17 – General Industrial and Service Zone, Report 20.3 and the associated text and maps.

Reasons for the appeal

7. The part of the Council’s decision appealed:
 - a. does not give effect to the higher order strategic directions, objective and policies in the Proposed Plan;
 - b. does not give effect to the National Policy Statement on Urban Development 2020;
 - c. does not represent an efficient use of land under section 7(b); and
 - d. overall, fails to promote sustainable management of natural and physical resources and therefore, does not achieve the purpose of the Act.

Relief Sought

8. The Appellant seeks that:
 - a. all of the land at 14 Bush Creek Road (Lot 1 DP20056 and Lot 1 DP24863) be rezoned to:
 - i. BMUZ; or
 - ii. an amended BMUZ or GIZ with provision for more mixed use commercial and residential activities; and
 - b. any other additional or consequential relief to the PDP text or maps that will give effect to the matters raised in this appeal.

Attached Documents

9. The following documents are **attached** to this notice:
 - a. A copy of the Appellant’s Stage 3 submissions as **Appendix 1**;

- b. A copy of the relevant part of the Mapping Decision as **Appendix B**; and

Dated this 17th day of May 2021

Michael Thomas

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